REMARKS

Claims 23-43 are pending in the application that are presented for reconsideration and further examination in view of the following remarks.

REJECTIONS UNDER §102

In the outstanding Office Action claims 23-25, 27, 28 33-36 and 38 were rejected under 35 U.S.C §102(b) as being anticipated by U.S. Patent No. 5,524,169 (Cohen). Applicant respectfully traverses this ground of rejection. Though the following remarks are directed primarily to the rejected independent claims, they apply with equal force to each of the claims which depend therefrom.

Cohen describes a method and system for reducing perplexity in a speech recognition system based upon a determined geographic location. (Cohen, abstract). This system is described as being implemented utilizing "any suitably programmed portable computer." (Cohen, col. 3, lines 39-40). This system is described as including "a core library 38 of speech templates" and "multiple location–specific libraries 40" which are also stored within memory 36. (Cohen, col. 4, lines 33-36). Each location–specific library 40 includes templates which are representative of a specialized vocabulary for a particular geographical location. (Cohen, col. 4, lines 36-38) The location–specific libraries of Cohen are not dynamically built responsive to the determined coordinate location of the mobile device. Rather they are described as being pre-stored in the speech recognition system.

Independent claim 23 is directed to a method of recognizing speech transmitted from a mobile device in a communication network based on the location of the mobile device. The claim includes the limitations of, inter alia, determining a coordinate location of the mobile

device and "building a dynamic grammar responsive to the determined coordinate location of the mobile device." Dynamic grammars are described in the application, for example, on page 23 beginning at line 6 as "grammars that are built on the fly that are a subset of the universe of words to be recognized." Building a dynamic grammar responsive to the determined location of the mobile device provides the method with great flexibility and efficiency. For example, for the system of Cohen to provide a nationwide system of location specific libraries would be extremely inefficient. Such a system would require hundreds of thousands of location specific libraries or very general location definitions (e.g., California). However, very general location definitions would not provide the ability to create location specific libraries. Applicants' claimed method can dynamically build a grammar based upon a list of street names, or other information within a predefined area around the determined location. This can provide very specific dynamic grammars without the need to store large numbers of pre-determined grammars.

Independent claim 33 adds the further limitation of "wherein building the dynamic grammar responsive to the determined coordinate location of the mobile device is also responsive to information provided by the user of the mobile device." No such limitation is taught or suggested by Cohen. Cohen describes that as an alternative to the system 12 determining the geographic location of the system, "a user may simply enter an indication of geographic location into mobile speech recognition system 12 utilizing keyboard 14." (Cohen, col. 4, lines 23-25) Claim 33 uses a combination of the determined coordinate location and information provided by the user of the mobile device. An example of the method of claim 33 is provided on page 23 of the application as building a dynamic grammar based upon the determined location of the mobile device and a partial address, such as a primary street address, provided by the user. No such method is taught or suggested by Cohen.

Independent claim 34 is similar to independent claim 23 but includes the limitation of "building a dynamic grammar of information spatially related to the mobile device location based upon a distance around the determined location of the mobile device." As was discussed above, Cohen includes no teaching or suggestion of building of dynamic grammar. Additionally, Cohen includes no teaching or suggesting of the building of a grammar based upon a distance around the determined location of the mobile device. Cohen simply refers to the multiple location-specific libraries as including templates "which are representative of a specialized vocabulary for a particular geographic location." (Cohen, col. 4, lines 32-38) Cohen does not describe or disclose that the geographic location is defined as the distance around the determined location of the mobile device. Of course, because Cohen is not building a dynamic grammar, Cohen could not define that grammar in terms of a distance around a presently determined location.

In view of the foregoing, applicant respectfully submits that the rejection and restrictions have been overcome and should be withdrawn.

REJECTIONS UNDER §103

In the Office Action claims 29-32 and 39-43 were rejected under 35 U.S.C §103 (a) as being unpatentable over Cohen in view of U.S. Patent No. 7,036,128 (Julia). Applicant respectfully traverses this ground of rejection. Additionally, claims 26 and 37 were rejected under §103 as being unpatentable over Cohen in view of "well known prior art." This rejection is also respectfully traversed.

With regard to the dependent claims rejected under §103, applicant respectfully submits that they are patentable at least for the reasons set forth herein with regard to the independent

claims from which they depend. Applicant reserves the right to challenge whether Julia is available as prior art against the present application.

With regard to independent claim 39, that claim includes the limitation of, inter alia, "building a dynamic grammar in response to the determined location of the mobile device." For the reasons stated above, Cohen does not teach or suggest building a dynamic grammar in response to the determined location. Julia does not provide any teaching or suggestion to overcome that deficiency.

Additionally, Applicant has reviewed the sections of Julia's cited in the rejection of claim 39 as teaching "using the determined location of the mobile device to generate a user prompt; transmitting the user prompt to the mobile device; and capturing a vocal expression of the speaker utilizing the mobile device in response to the user prompt." However, the cited sections of Julia describe a user speaking a request for directions to a location and the system then providing visual and/or spoken directions to that location. There does not appear to be any teaching or suggestion where the system provides a prompt to which the user responds and then analyzing that response using a dynamic grammar. There does not appear to be any teaching of a prompt from the system to which a user vocally responds. Particularly, there does not appear to be any such teaching where the prompt is based upon the geographic location of the device. Therefore, applicant respectfully submits that the rejection under §103 has been overcome and should be withdrawn.

CONCLUSION

The Applicant has endeavored to address all of the Examiner's concerns as expressed in the outstanding Office Action. In light of the above remarks, reconsideration and withdrawal of the outstanding rejections is specifically requested. If the Examiner finds any remaining impediment to the prompt allowance of these claims that could be clarified with a telephone conference, the Examiner is respectfully requested to initiate the same with the undersigned.

Respectfully submitted,

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Richard E. Campbell
Reg. No. 34,790

PROCOPIO, CORY, HARGREAVES & SAVITCH LLP
530 B Street, Suite 2100
San Diego, California 92101-4469
(619) 238-1900 (Phone)
(619) 235-0398 (Fax)